

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

The Honorable Robert B.
Kugler, District Court Judge

**CERTIFICATION OF
VICTORIA DAVIS
LOCKARD, ESQ.**

I, Victoria Davis Lockard, Esq., certify as follows:

1. I am a Shareholder with the law firm Greenberg Traurig, LLP, and an attorney of record in the above-captioned litigation representing Defendants Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries Ltd., Actavis LLC, and Actavis Pharma, Inc.

2. I make this certification based on personal knowledge and in support of the Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion to Strike Defendants' Expert Michael B. Bottorff's purportedly "new and altered" general causation opinions. ("Defendants' Opposition").

3. Exhibit A to Defendants' Opposition is a true and accurate copy of the transcript of the March 25, 2022 deposition of Defense Expert Michael B. Bottorff, Pharm.D. This document has been filed with redactions to the extent it contains information that has been designated as "PROTECTED INFORMATION" as defined in the Protective Order.

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: June 2, 2022

Respectfully submitted,

By: /s/ Victoria Davis Lockard

GREENBERG TRAURIG, LLP
Victoria Davis Lockard
Terminus 200
3333 Piedmont Road, N.E.,
Suite 2500
Atlanta, Georgia 30305
Tel. (678) 553-2100
Fax. (678) 553-2386
LockardV@gtlaw.com

*Counsel for Teva Pharmaceuticals
USA, Inc., Teva Pharmaceutical
Industries Ltd., Actavis Pharma, Inc.,
and Actavis LLC*

CERTIFICATE OF SERVICE

I, Gerond J. Lawrence, an attorney, hereby certify that on June 2, 2022, I caused the foregoing Certification of Victoria Davis Lockard to be served on all counsel of record via the Court's electronic filing service ("ECF").

/s/ Gerond J. Lawrence

Gerond J. Lawrence

Greenberg Traurig, LLP